

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X :  
: Case no. 07-CV-9416 (RJS)  
IN RE FUWEI FILMS SECURITIES :  
LITIGATION :  
: CLASS ACTION  
-----X :

**LEAD PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR:  
(1) FINAL APPROVAL OF PROPOSED CLASS ACTION SETTLEMENT; AND  
(2) AWARD OF COUNSEL FEES AND REIMBURSEMENT OF EXPENSES**

PLEASE TAKE NOTICE that on April 27, 2011 at 10:00 a.m. in Courtroom 21C of the United States District Court located at 500 Pearl Street, New York, NY, plaintiffs will and hereby do move the Court, the Honorable Richard J. Sullivan, for final approval of the proposed class action settlement and an award of counsel fees and reimbursement of expenses.

This motion is based upon this notice of motion and motion, the accompanying memorandum of points and authorities, the accompanying declaration of Phillip Kim in support of the motion, the exhibits attached thereto, and such argument and additional papers as may be submitted to the Court before and at the hearing on this motion.

Dated: March 28, 2011

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/ Phillip Kim

Phillip Kim, Esq. (PK 9384)  
Laurence M. Rosen, Esq. (LR 5733)  
Timothy W. Brown, Esq. (TB 1008)  
275 Madison Avenue, 34<sup>th</sup> Floor  
New York, New York 10016  
Telephone: (212) 686-1060  
Fax: (212) 202-3827

Email: [pkim@rosenlegal.com](mailto:pkim@rosenlegal.com)

Email: [lrosen@rosenlegal.com](mailto:lrosen@rosenlegal.com)

Email: [tbrown@rosenlegal.com](mailto:tbrown@rosenlegal.com)

Lead Counsel for Plaintiffs and the Class

**CERTIFICATE OF SERVICE**

I hereby certify that on this on the 28<sup>th</sup> day of March 2011, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/Phillip Kim